## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

VENTAS REALTY, LIMITED PARTNERSHIP,	)
Plaintiff, v.  ALC CVMA, LLC, ALC GGMG, LLC, ALC HTIF, LLC, ALC PEDG, LLC, ALC TPCG, LLC, ALC TISSC, LLC, ALC TSKG, LLC, ALC WRWG, LLC, and ASSISTED LIVING CONCEPTS, INC.,	) ) ) No.: 12-cv-3107 ) ) Judge Ronald A. Guzman ) ) Magistrate Judge Sidney I. Schenkier ) )
Defendants	

#### NOTICE OF DEPOSITION OF ASSISTED LIVING CONCEPTS, INC.

Please take notice that Plaintiff Ventas Realty, Limited Partnership ("Ventas") will take the deposition of Defendant Assisted Living Concepts, Inc. ("ALC") at 1:00 p.m. on June 7, 2012 pursuant to Fed. R. Civ. P. 30(b)(6). The deposition will take place at the offices of Quarles & Brady LLP, 411 E. Wisconsin Ave. Milwaukee, WI 53202. Pursuant to Rule 30(b)(6), ALC is required to designate one or more persons who shall testify knowledgeably about the subjects listed on the attached **Exhibit A**. The deposition will be recorded by videotape and/or stenographic means.

Dated: May 31, 2012

Respectfully submitted,

VENTAS REALTY, LIMITED PARTNERSHIP

By:

One of Its Attorneys

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# EXHIBIT A

### MATTERS FOR WHICH EXAMINATION IS REQUESTED

- 1. The "possible irregularities" ALC is investigating in connection with the "lease with Ventas" referenced in ALC's May 4, 2012 Form 8-K filing.
- 2. The subject(s) of the ongoing internal investigation as referenced in ALC's May 14, 2012 Form 8-K filing.

### **CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on May 31, 2012, he caused a copy of the foregoing Notice of Deposition of Assisted Living Concepts, Inc. to be served on the following via e-mail:

Leonard S. Shifflett Quarles & Brady LLP 300 North LaSalle Street Suite 4000 Chicago, Illinois 60654

Roger H. Stetson